

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

MATTHEW KLINE, MARK KLINE, on  
behalf of minor, HAYDEN KLINE,

Case No. 16-cv-13157  
Honorable Gershwin A. Drain

Plaintiffs,

vs.

GEMINI TRANSPORT, LLC,  
AMARILDO ZERE, FEDEX GROUND  
PACKAGE SYSTEM, INC., and  
DELBERT E. LALLATHON, JR.,

Defendants.

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**DEFENDANT FEDEX GROUND PACKAGE SYSTEM, INC. AND DELBERT E.  
LALLATHON, JR.'S CONCURRENCE WITH DEFENDANTS GEMINI TRANSPORT,  
LLC AND AMARILLO ZERE'S MOTION TO DISMISS OR IN THE ALTERNATIVE  
TO TRANSFER VENUE TO THE SOUTHERN DISTRICT COURT IN INDIANA**

Defendants, FEDEX GROUND PACKAGE SYSTEM, INC. and DELBERT E. LALLATHON, JR., by and through their attorneys, KEVIN J. PLAGENS and KOPKA PINKUS DOLIN PLC, hereby **CONCUR** with Defendants Gemini Transport, LLC and Amarillo Zere's Motion to Dismiss or in the Alternative to Transfer Venue to the Southern District Court in Indiana.

Respectfully Submitted,

KOPKA PINKUS DOLIN PLC

*/s/ Kevin J. Plagens*

By: \_\_\_\_\_  
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Dated: November 18, 2016

**CERTIFICATE OF SERVICE**

I, Kimberly Ramsay, am an employee of Kopka Pinkus Dolin PLC, and I certify that I e-filed the foregoing document on November 18, 2016 using the ***ECF File & Serve e-filing system*** which will send a copy of this document together with notification to all counsel of record; and that I mailed a copy of this document to any non-e-filing participants.

*/s/Kimberly Ramsay*  
\_\_\_\_\_  
Kimberly Ramsay